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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ,  
JULIAN SANTIAGO, and SUSAN LYNN  
HARVEY, individually and on behalf of all  
others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

**SUSMAN GODFREY L.L.P.**

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Case No.: 3:20-cv-04688-RS

**DECLARATION OF JONATHAN  
HOCHMAN IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PERMANENT INJUNCTION AND  
DISGORGEMENT OF PROFITS**

The Honorable Richard Seeborg  
Courtroom 3 – 17th Floor

1 I, Dr. Jonathan Hochman, declare as follows:

2 1. I submit this declaration in connection with Plaintiffs' Motion for Permanent  
3 Injunction and Disgorgement of Profits. I have personal knowledge of the matters set forth herein  
4 and am competent to testify.

5 2. Plaintiffs' counsel asked me to re-test the applications examined in connection with  
6 Appendix G of my opening expert report (Dkt. 314-7) to determine whether the at-issue sWAA-  
7 off data collection by Google appears to have changed since the trial or if the conduct appears to  
8 be ongoing.

9 3. This was the same testing conducted before, utilizing a Google account with sWAA  
10 off and capturing the network activity originating from the device using a combination of  
11 HTTPToolkit (for Android) and Charles Proxy (for iOS) and then utilizing the User Agent header  
12 combined with the decoded request bodies to determine whether Google continues to engage in  
13 the same sWAA-off data collection as before.

14 4. I have observed no material differences when comparing the findings I outlined in  
15 Appendix G of my opening report to this additional testing, which shows that Google continues to  
16 engage in the same sWAA-off data collection practices challenged at trial.

17  
18 I declare under penalty of perjury that the foregoing is true and correct.

19 Executed on: October 22, 2025.

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21   
22 /s/ Jonathan Hochman

23 Dr. Jonathan Hochman  
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